

1 PHILLIP A. TALBERT
United States Attorney
2 MATHEW W. PILE, WSBN 32245
Associate General Counsel
3 Office of Program Litigation, Office 7
Social Security Administration
4 ERIN A. JURRENS, MO 61402
Special Assistant United States Attorney
5 Office of the General Counsel
Social Security Administration
6 6401 Security Boulevard
7 Baltimore, MD 21235
8 Telephone: (877) 833-2445
E-Mail: Erin.Jurrens@ssa.gov
9 Attorneys for Defendant

10
11 **UNITED STATES DISTRICT COURT**
12 **EASTERN DISTRICT OF CALIFORNIA**

13 TONYA NUNES GREENE,) CIVIL NO. 2:24-cv-01135-SCR
14 Plaintiff,)
15 v.) **STIPULATION TO VOLUNTARY**
16 Commissioner of Social Security,) **REMAND PURSUANT TO SENTENCE**
17 Defendant.) **FOUR OF 42 U.S.C. § 405(g) AND TO**
18) **ENTRY OF JUDGMENT; [PROPOSED]**
19) **ORDER**

20 IT IS STIPULATED by and between Plaintiff (“Plaintiff”) and Defendant
21 Commissioner of Social Security (“Defendant”), through their undersigned counsel of record,
22 that the above-entitled action shall be remanded to the Commissioner of Social Security for
23 further administrative proceedings.

24 Upon remand, the Appeals Council will remand the case to an Administrative Law
25 Judge (ALJ) for a new decision, and instruct the ALJ to re-evaluate the evidence of record. The
26 parties further request that the Court direct the Clerk of the Court to enter a final judgment in
27 favor of Plaintiff, and against Defendant, reversing the final decision of the Commissioner.
28

1 This stipulation constitutes a remand under the fourth sentence of Section 205(g) of the
2 Social Security Act, 42 U.S.C. 405(g).

3
4 Dated: October 15, 2024

/s/ Francesco Benavides*

FRANCESCO BENAVIDES

Attorney for Plaintiff

*Authorized via e-mail on October 15, 2024

PHILLIP A. TALBERT

United States Attorney

MATHEW W. PILE

Associate General Counsel

Social Security Administration

By: /s/ Erin Jurrens

ERIN JURRENS

Special Assistant U.S. Attorney

Attorneys for Defendant

17 **[PROPOSED] ORDER**

18 Based upon the parties' Stipulation to Voluntary Remand Pursuant to Sentence Four of
19 42 U.S.C. § 405(g) and to Entry of Judgment ("Stipulation to Remand"), and for cause shown,
20 **IT IS ORDERED** that the above-captioned action is remanded to the Commissioner of Social
21 Security for further proceedings pursuant to the fourth sentence of Section 205(g) of the Social
22 Security Act, 42 U.S.C. 405(g).

23 DATED: October 15, 2024

24
25 

26 SEAN C. RIORDAN

27 UNITED STATES MAGISTRATE JUDGE